

EXHIBIT 2

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES ALEX
FIELDS, JR., VANGUARD AMERICA,
ANDREW ANGLIN, MOONBASE
HOLDINGS, LLC, ROBERT “AZZMADOR”
RAY, NATHAN DAMIGO, ELLIOTT
KLINE a/k/a ELI MOSELEY, IDENTITY
EVROPA, MATTHEW HEIMBACH, MATTHEW
PARROTT a/k/a DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-KNIGHTS,
MICHAEL “ENOC” PEINOVICH, LOYAL
WHITE KNIGHTS OF THE KU KLUX KLAN,
and EAST COAST KNIGHTS OF THE KU KLUX
KLAN a/k/a EAST COAST KNIGHTS OF THE
TRUE INVISIBLE EMPIRE,

Defendants.

DEFENDANT’S FIELDS’ RESPONSE TO PLAINTIFFS’ FIRST SET OF
REQUEST FOR ADMISSIONS

COMES NOW Defendant JAMES ALEX FIELDS, JR. (“Fields”), by counsel, and for his

RESPONSE: Admitted.

181. Admit that the document with Bates Number City_00011952 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on June 30, 2018.

RESPONSE: Admitted.

182. Admit that the document with Bates Number City_00012043 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on August 12, 2018.

RESPONSE: Admitted.

183. Admit that the document with Bates Number City_00012220 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on December 2, 2018.

RESPONSE: Admitted.

184. Admit that the document with Bates Number City_00012222 is a true and accurate audio-recording of a telephone call between you and Samantha Bloom on December 4, 2018.

RESPONSE: Admitted.

185. Admit that the document beginning with Bates Number City_00019602 is a true and correct copy of the date from your Facebook account.

RESPONSE: Admitted.

186. Admit that the document with Bates Number City_00032347 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

187. Admit that the document with Bates Number City_00032348 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

RESPONSE: Admitted.

364. Admit that the document beginning with Bates Number NOCUSTODIAN00044893 is a series of photographs, each of which is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

365. Admit that the document with Bates Number NOCUSTODIAN00044815 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

366. Admit that the document with Bates Number AERIAL00000001 is a true and accurate depiction and representation of your car on August 12, 2017.

RESPONSE: Admitted.

367. Admit that you used the name Conscious Ovis Aries on your Facebook account.

RESPONSE: Admitted.

368. Admit that you used the email address jay.fields@live.com

RESPONSE: Admitted.

369. Admit that you used the email address james.fields.9279@facebook.com

RESPONSE: Admitted.

370. Admit that you used the email address Amerikan-steel@outlook.com.

RESPONSE: Admitted.

371. Admit that you used the email address dersschwarzesonne@gmail.com

RESPONSE: Admitted.

372. Admit that you lived Maumee, Ohio in August 2017.

RESPONSE: Admitted.

373. Admit that in August 2017, your cell phone number was 859-414-9660.

RESPONSE: Admitted.

374. Admit that in August 2017, Samantha Bloom's cell phone number was 859-814-1925.

RESPONSE: Admitted.

375. Admit that you used the username "TheRealGiantDad" for your Twitter account.

RESPONSE: Admitted.

376. Admit that you used the username "TheNewGiantDad" for your Twitter account.

RESPONSE: Admitted.

377. Admit that you used the username "thebigboss1337" for your Instagram account.

RESPONSE: Admitted.

Respectfully submitted,

JAMES ALEX FIELDS, JR.
By Counsel

/s/ David L. Campbell

David L. Hauck, Esquire (VSB# 20565)
David L. Campbell, Esquire (VSB #75960)
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